

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>WAH SING (US) TRADING</b>	)	
<b>LIMITED, LLC D/B/A EASYBIT,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 1:16-cv-0504</b>
	)	
<b>DEDRIC DUNCAN,</b>	)	
	)	
<b>Defendant.</b>	)	

**DECLARATION OF MICHAEL J. DUPREE, JR.**

1. My name is Michael J. Dupree, Jr. I am over the age of eighteen (18) and competent to give this Declaration. It is based on my personal knowledge and review of certain business records of Plaintiff Wah Sing (US) Trading Limited, LLC d/b/a EasyBit (“Plaintiff” or “EasyBit”). This Declaration is given for use in support of Plaintiff’s Motion for Temporary Restraining Order in the above-styled action, and for all other purposes permitted by law.

2. I am the founder and Chairman of EasyBit.

3. EasyBit is one of the world's leading Bitcoin ATM companies. It provides access to buy and/or sell bitcoin in over a dozen countries.

4. Attached as Exhibit A is a fair and accurate photograph of a typical EasyBit Bitcoin ATM.

5. Attached as respectively Exhibits B, C, D, and E are true and correct copies of the Agreements for the Placement of a Bitcoin ATM between EasyBit, as Licensor, and Headmasters Barbershop, Vape2o LLC, Vape Dynamiks, and Pale Eddie's Pour House, as Licensees (the "Bitcoin ATM Agreements"). Each of the Bitcoin ATM Agreements was signed on behalf of EasyBit by Defendant Dedric Duncan ("Defendant" or "Duncan") in his capacity as CEO of EasyBit.

6. Either party may terminate the Bitcoin ATM Agreements without cause "by giving the other party written notice sixty (60) days prior to such intended termination." (Section VIII of the Bitcoin ATM Agreements). Neither EasyBit nor any of the Licensees has given such written notice of termination of the Bitcoin ATM Agreements.

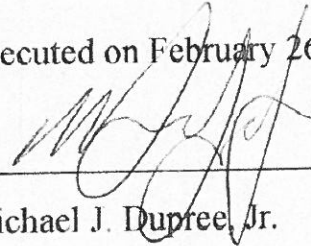
7. Nonetheless, after Duncan abruptly resigned from EasyBit on February 4, 2016, EasyBit's Bitcoin ATM that was located at Headmasters Barbershop in Atlanta, Georgia was removed and replaced by a Bitcoin ATM from a competitor of EasyBit. It is my understanding that Duncan personally made this substitution or arranged to have it done.

8. Attached as Exhibit F is a true and correct copy of a screen shot from the EasyBit website during the time that Duncan was employed by EasyBit that identifies him as its CEO. The website has been revised since Duncan quit to remove his name and photo from "The Team" at EasyBit.

9. Attached as Exhibit G is a true and correct copy of a facsimile that was sent to me on February 16, 2016 by attorney T. Blake Liveoak, who has held himself out to me as representing Duncan and EasyBit Alabama, LLC ("EasyBit Alabama") even though EasyBit Alabama is a wholly owned subsidiary of EasyBit. In this facsimile, Mr. Liveoak states, among other things, that "Dedric and Easy Bit Alabama will continue to operate in Alabama and Georgia."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 26, 2016



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Michael J. Dupree, Jr.